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5 IN THE UNITED STATES DISTRICT COURT
6 FOR THE NORTHERN DISTRICT OF CALIFORNIA
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8 IN RE: UBER TECHNOLOGIES, INC.,
9 PASSENGER SEXUAL ASSAULT
10 LITIGATION

11 This Document Relates to:
12 ALL CASES
13

Case No. 23-md-03084-CRB

**AFFIDAVIT OF TIFFANY R. ELLIS IN
SUPPORT OF PLAINTIFFS' LIST OF
DISPUTED ENTRIES FOR SPECIAL
MASTER REVIEW**

Judge: Honorable Barbara S. Jones

1 I, Tiffany R. Ellis, hereby declare as follows:

2 1. I am a partner of Peiffer Wolf Care Kane Conway & Wise, an attorney licensed in
3 the States of Michigan and Illinois and duly admitted to practice before this Court, representing
4 Plaintiffs in the above caption action.

5 2. I submit this declaration in support of Plaintiffs' List of Disputed Entries to
6 Uber's May 19, 2025 Privilege log that was submitted for Master Review on June 2, 2025.

7 3. Plaintiffs incorporate the Discovery Letter Brief Regarding Disputed Entries for
8 Master Review filed by All Plaintiffs on March 4, 2025. *See* ECF No. 2434. Plaintiffs
9 incorporate the brief to support the specific reasons each entry on Plaintiffs' List of Disputed
10 Entries to Uber's May 19, 2025 Privilege log was challenged. The Brief included the general
11 background of the privilege dispute process to date, the legal standard for Plaintiffs raising
12 challenges to Defendants' privilege log entries, and a general argument for the challenges
13 Plaintiffs raised.

14 **Uber's May 19, 2025 Privilege log**

15 4. Defendants issued a privilege log on May 19, 2025 containing 935 entries.

16 5. On May 30, 2025, Plaintiffs provided the Defendants with a list of 160 disputed
17 entries from Defendants' May 19, 2025 privilege log.

18 6. The Parties meet and conferred on May 30, 2025 regarding the disputed entries.

19 7. On June 2, 2025, the Plaintiffs provided a list of 151 entries remaining in dispute
20 to the Master and Defendants.

21 8. On June 10, 2025, Parties agreed further conferral is required for entries
22 JCCP_MDL_PRIVLOG096566 and JCCP_MDL_PRIVLOG096621 and respectfully request
23 that the Master temporarily set aside review of these two documents.

24 Executed this 11th day of June 2025 in Detroit, Michigan.

25
26 /s/ Tiffany R. Ellis
Tiffany R. Ellis